CARL RITTIMAN & ASSOCIATES, INC.

Certified Professional Soil Scientist

PO Box 590 • Mendocino CA 95460

Date: 11/14/11

Re: State Policy for Water Quality Control for Siting, Design, Operation, and Managements of Onsite Wastewater Treatment Systems

To Whom it May Concern,

I am impressed by the effort that has gone into the latest revision of this policy, however there is one issue that I feel has not been adequately addressed. This is the definition of Qualified Professional and the continuing neglect to recognize the profession of Soil Science and include Certified Professional Soil Scientists in the definition of Qualified Professionals.

For land based wastewater disposal systems no group is better qualified to evaluate a site for use for an on-site sewage disposal system than those who specifically study the soil system, Soil Scientists.

I suggest that the definition of Qualified Professionals in this document be altered to include Certified Professional Soil Scientists:

"Qualified professional" means an individual licensed or certified by a State of California agency to design and/or construct OWTS. Depending on the work to be performed and various licensing and registration requirements, this may include an individual who possesses a registered environmental health specialist certificate, a certified professional soil scientist or an individual that is currently licensed as a professional engineer or professional geologist.

Soil Scientists that are certified by the Soil Science Society of America must pass both a Fundamentals of Soil Science and a Professional Practice Examination, must have at least 5 years experience with at least a Bachelor of Science degree majoring in Soil Science, 3 years with an MS or PhD., and document their educational experience with transcripts and supporting references, they must sign and uphold the Soils Code of Ethics and, once certified, must earn 40 hours of Continuing Education every two years.

Due to the relatively small numbers of Soil Scientists in the population, it has become very difficult to develop a State Certification program. At this time the National Certification is the only certification available to Soil Scientists in California.

Currently, there is no State of California certification for Soil Scientists but not acknowledging them in this definition would preclude any future ability for them to practice in this field should a State certification become available.

I thank you for the opportunity to comment on this proposed policy.

Sincerely,

Carl Rittiman, CPSS

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